

## ENVIRONMENTAL REVIEW COMMITTEE REPORT

**ERC MEETING DATE:** December 8, 2014

**Project Name:** Renton Sunset Terrace Redevelopment Reevaluation and Addendum

**Owner/Applicant:** City of Renton; Renton Housing Authority; Sunset Terrace Development LLC

**File Number:** LUA 14-001475, ECF, SA-M

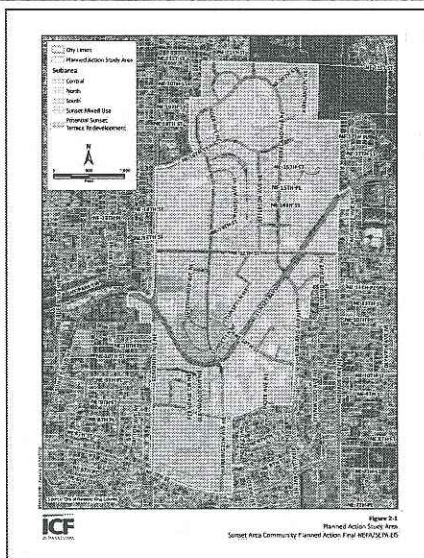
**Project Manager:** Rocale Timmons, Senior Planner

**Project Summary:** The City of Renton, along with the Renton Housing Authority (RHA), King County Library System, Colipitts Development, and community partners, is redeveloping the Sunset Terrace public housing community, an approximately 15.28-acre site within the larger Sunset Area Community Neighborhood in northeast Renton. Redevelopment of this area envisions Sunset Terrace as a mixed-use, mixed-income community anchored by a new public library and a new park. Mixed-use sites will have both market rate and affordable rental housing in multi-story, multi-family townhomes and apartments, along with commercial and retail space. Proposed residential land includes apartments and attached townhomes that are generally between two and four stories in height, extending to five and six stories along SR 900, which will provide 722 total dwelling units. Proposed commercial space would equal between 19,500-59,000 square feet, with 15,000 square feet consisting of a newly relocated Renton Highlands Library (this use has already been permitted and is under construction), and the rest consisting of retail or office space depending on market needs.

**Project Location:** Located in northeast Renton, the Sunset Terrace community is generally bounded by Sunset Blvd NE on the south that forms a "U-shaped" border, Glenwood Avenue NE and NE 10th Street on the north; Harrington Avenue NE bisects the area.

**Site Area:** Approx. 15.28 ac

**STAFF RECOMMENDATION:** Issue the ROD Reevaluation and Addendum and Adopt Existing Environmental Document



**Project Location Map**



**PART ONE: PROJECT DESCRIPTION / BACKGROUND**

The City of Renton, along with the Renton Housing Authority (RHA), King County Library System, and Colpitts Development, and community partners, is redeveloping the Sunset Terrace public housing community, an approximately 15-acre site within the larger Sunset Area Community Neighborhood in northeast Renton.

Constructed in 1959, Sunset Terrace is the oldest multifamily public housing complex directly managed by RHA. It contained more than 110 dwelling units within 27 buildings. The Sunset Terrace public housing community is generally bounded by Sunset Lane NE and Glenwood Avenue NE on the north, NE 10th Street on the east, NE Sunset Boulevard (State Route [SR] 900) on the south, and Edmonds Avenue NE on the west. RHA owns additional vacant and residential land along Edmonds Avenue NE, Glenwood Avenue NE, Harrington Ave NE, Kirkland Ave NE, and Sunset Lane NE, and the Authority plans to incorporate these additional properties into the Sunset Terrace redevelopment for housing and associated services.

In May 2011, the City of Renton completed a Record of Decision (ROD) in accordance with the National Environmental Policy Act (NEPA), and adopted a Planned Action Ordinance in accordance with the State Environmental Policy Act (SEPA) for redevelopment of the Sunset Terrace area. The NEPA/SEPA Final Environmental Impact Statement (FEIS) supporting both milestones was issued April 1, 2011.

The ROD and Planned Action established a range of growth and associated facility and infrastructure investments (e.g., park, library, "green streets," etc.) for the Sunset Area Community Planned Action Study Area, for the neighborhood as a whole and for the Sunset Terrace Redevelopment, a site then fully owned by the Renton Housing Authority (RHA).

Since the original FEIS analysis, redevelopment efforts have continued, additional site planning has occurred, and some changes in the number and configuration of units are now proposed. The number of total dwellings currently under consideration exceeds the number of dwellings studied in the FEIS and considered in the ROD and Planned Action Ordinance (~ 90 more units than Alternative 3 in the Sunset Terrace area; neighborhood totals remain the same). Reconfiguration of the central park has reduced the footprints of adjacent buildings, commensurately increasing height and density at these locations.

Building heights would be increased beyond City maximums for the applicable zone, which would require a discretionary Conditional Use Permit. As for density, many sites in the Sunset Terrace Redevelopment Area propose higher densities above the maximum density allowed in their associated zone. However, viewed in context of the overall Sunset Terrace Site, which since 2011 has been planned comprehensively as a coordinated mixed use redevelopment project with park amenities, the density would equal about 65 units per acre, less than the 80 units per acre maximum. The use of density, beyond the maximums for specific sites would require discretionary density transfer agreements.

Setbacks of buildings from the future SR 900 improvement boundaries are less than for the FEIS Preferred Alternative. Lastly, the City is considering reclassifying some local streets serving the Sunset Area to allow a more efficient roadway cross-section while still facilitating circulation.

As a result of these potential changes, the City is preparing a revised Master Site Plan. The Master Site Plan would facilitate the preparation of phased and detailed Site Plans over time and allow the City to determine consistency with applicable regulations. This plan would also provide more certainty for members of the public and private developers.

In total, 722 dwelling units are proposed on sites A through O and X. Approximately 675 of these units are proposed on Master Plan sites C through O (Exhibit 2, Figure 6 for a detailed breakdown by site). Additionally, there is a range of commercial space with a low end of 19,500 square feet consistent with more recent planning efforts, and an upper range established in the FEIS of 59,000 square feet.

Site	Name	Status	Acres	Proposed Units	Total Units Reviewed in Reevaluation
A	Glennwood Townhomes	Constructed RHA	0.65	8	8
B	Kirkland Avenue Townhomes	Under Construction RHA	0.77	18	18
C	Edmonds Apartments	Part of Master Site Plan	1.7	99	112
D	Sunset Terrace Apartments	Part of Master Site Plan	0.51	41	54
E	Sunset Park West Townhomes	Part of Master Site Plan	0.55	10	10
F	Sunset Court Townhomes	Part of Master Site Plan	0.88	15	15
G	Sunset Park East (Piha) Townhomes & Apts	Part of Master Site Plan	1.09	56	57
H	Sunset Terrace Dev. Building A	Part of Master Site Plan	0.56	111	117
I	Sunset Terrace Dev. Building B	Part of Master Site Plan	1.18	188	196
J	Sunset Terrace Dev. Building C	Part of Master Site Plan	0.74	104	110
K	Renton Highlands Library	Part of Master Site Plan	0.43		
L	Regional Stormwater Facility	Part of Master Site Plan	See M		
M	Sunset Park	Part of Master Site Plan	3.2		
N	Sunset Lane Loop Improvements	Part of Master Site Plan	1.41		
O	NE 10th Street Extension Improvements	Part of Master Site Plan	0.2		
X	Library Site (2013)	Future Development	1.41	25	25
<b>Totals</b>			<b>15.28</b>	<b>675</b>	<b>722</b>
Total Units: Difference Master Plan Proposals with EIS Preferred Alternative				162	209
Total Units: Difference with EIS Alternative 3				43	90

The revised proposal to include additional units and height, and to revise existing street standards requires a NEPA Reevaluation, pursuant to Section 58.47 of US Department of Housing and Urban Development's (HUD's) NEPA regulations, demonstrating that the original conclusions of the FEIS remain valid. SEPA also provides a process, using an Addendum to the prior FEIS where new information or analysis does not substantially change prior conclusions about impacts (WAC 197-11-706).

The purpose of this document is to provide summary of the Reevaluation and Addendum (Exhibit 2), which serves to meet the requirements of both a NEPA Reevaluation and a SEPA Addendum and that demonstrates the FEIS original conclusions are valid. This analysis would also provide the basis for planned ROD and/or Planned Action Ordinance amendments.

The City analyzed three alternatives (Alternatives 1, 2, and 3) as part of the Draft EIS to determine its Preferred Alternative. The Preferred Alternative is evaluated in the Final EIS. A Reevaluation Alternative has now been developed. All five alternatives are described below.

**Alternative 1 (No Action).** RHA would develop affordable housing on two vacant properties, but it would not redevelop the Sunset Terrace public housing property. Very limited public investment would be



implemented by the City, resulting in lesser redevelopment across the Planned Action Study Area. A Planned Action would not be designated. The No Action Alternative is required to be studied under NEPA and SEPA.

**Alternative 2.** This alternative represents a moderate level of growth in the Planned Action Study Area based on investment in mixed-income housing and mixed uses in the Potential Sunset Terrace Redevelopment Subarea, targeted infrastructure and public services throughout the Planned Action Study Area, and adoption of a Planned Action Ordinance.

**Alternative 3.** This alternative represents the highest level of growth in the Planned Action Study Area, based on investment in the Potential Sunset Terrace Redevelopment Subarea with a greater number dwellings developed in a mixed-income, mixed-use style, major public investment in study area infrastructure and services, and adoption of a Planned Action Ordinance.

**Preferred Alternative.** This alternative represents neighborhood growth similar to and slightly less than Alternative 3 in the Planned Action Study Area, based on investment in the Potential Sunset Terrace Redevelopment Subarea with a moderate number dwellings developed in a mixed-income, mixed-use style oriented around a larger park space and loop road, major public investment in study area infrastructure and services, and adoption of a Planned Action Ordinance.

**Reevaluation Alternative.** This alternative proposes neighborhood growth the same as Alternative 3, with slightly more units (approximately 90 units) redirected to the Sunset Terrace subarea. Sunset Terrace would have a mixed-income, mixed-use development similar to Alternative 3 and the Preferred Alternative, with a larger park and with dwellings focused more along SR 900. Greenstreets, library uses, and other investments would be similar to those proposed for Alternative 3 and the Preferred Alternative.

#### FEIS Topics Analyzed:

The selected Sunset Area Alternatives including the Reevaluation Alternative, will generate impacts to various elements of the built and natural environments. The analysis below demonstrates, no substantive changes in conclusions or required mitigation are needed as a result of the revised alternative, termed "Reevaluation Alternative." With the application of City-adopted development regulations and recommended mitigation measures combined with the application of other federal and state requirements, no significant unavoidable adverse impacts are anticipated. Those topics analyzed include: Land Use, Aesthetics, Transportation, Noise, Parks and Recreation, Public Services, and Utilities.

#### Other FEIS Topics

Generally, regarding natural environment topics (earth, air quality, water resources, plants and animals), there are no anticipated changes to overall conclusions or mitigation measures identified in the ROD (Exhibit 5) and Planned Action EIS (Exhibit 6) since the proposed mixed use development activities are essentially occurring within the same footprint and the impervious estimates in the FEIS and ROD are maintained.

Conditions, mitigation measures, and conclusions regarding Environmental Health and Historic/Cultural Features are likewise unchanged. No environmental health conditions or cultural resource features are known in the Potential Sunset Terrace Redevelopment Subarea, but in case such features are uncovered mitigation measures would apply. Built environment topics that are more suited to analysis under cumulative growth conditions include air quality and energy. The level of potential greenhouse gas emissions and energy use may be slightly higher in the Potential Sunset Terrace Redevelopment Subarea, but not in the neighborhood as a whole, and overall FEIS conclusions and mitigation measures are still applicable.



Lastly, regarding socio-economics, housing, and environmental justice, it is anticipated that the overall conditions and impacts regarding the potential for change in the neighborhood, need for relocation assistance, etc. identified in the FEIS are still valid, as the study area would still redevelop from present conditions to a mixed use, amenity-rich environment.

#### Monitoring and Review

The Planned Action Ordinance includes monitoring and review measures to be considered within five years of the ordinance adoption with some measures considered at the time of a NEPA Reevaluation (compliance with neighborhood goals and Leadership in Environmental and Energy Design rating system for Neighborhood Development [LEED-ND] criteria or equivalent), though monitoring and review are directed to the Planned Action area as a whole. The City has not reached a 5-year milestone, which would occur in 2016. Therefore, the evaluation would be extended five years from the new effective date of the ordinance. At that point more development in the area would have occurred and there would be results to monitor.

Nevertheless, this Reevaluation provides a review of the Planned Action Study Area Goals and Objectives and to the LEED-ND criteria in relation to the Reevaluation Alternative to contribute to the City's future 5-year review effort. In general, the Reevaluation Alternative continues to promote a public and private effort to create a mixed use, mixed income neighborhood supported by park, library, road, and stormwater improvements that increase quality of life.

## **PART TWO: ENVIRONMENTAL REVIEW**

The City of Renton (City) is the Responsible Entity and lead agency for NEPA purposes. In accordance with specific statutory authority and the U.S. Department of Housing and Urban Development's (HUD's) regulations at 24 Code of Federal Regulations (CFR) part 58, the City is authorized to assume responsibility for environmental review, decision-making, and action that would otherwise apply to HUD under NEPA. Additionally, the City is the proponent of the broader Planned Action for the Sunset area, which has had environmental review under Washington State Environmental Policy Act (SEPA) Revised Code of Washington [RCW] 43.21C).

The City has performed joint NEPA/SEPA environmental review in cooperation with the Recipient, the Renton Housing Authority (RHA). Accordingly, the City prepared a Draft and Final EIS to analyze potential impacts of redevelopment of the Sunset Terrace public housing community (Exhibit 3). The Final Environmental Impact Statement (FEIS) supporting both milestones was issued April 1, 2011 (Exhibit 4).

In May 2011, the City of Renton completed the ROD in accordance with the National Environmental Policy Act (Exhibit 5), and a Planned Action Ordinance in accordance with the State Environmental Policy Act (Exhibit 6).

The ROD and Planned Action Ordinance identified mitigation measures from the FEIS. The ROD concluded that "the application of City-adopted development regulations and recommended mitigation measures, and application of other federal and state requirements, no significant unavoidable adverse impacts are anticipated. Pursuant to 40 CFR 1505.3, this decision to proceed with Sunset Terrace and actions in the broader area will be implemented and mitigation measures imposed through appropriate conditions in any land use or related permits or approvals issued by the City of Renton and through conditions of federal funding." The Reevaluation and Addendum (Exhibit 2) maintains the mitigation measures from the ROD and Planned Action (Exhibits 5 and 6 respectively) and identifies where the application of such mitigation measures (e.g., design guidelines) is particularly relevant and could be included in permit conditions.

### **A. Environmental Recommendation**

After considering the effects of the revised Master Site Plan as well as existing and supplemental environmental documentation, staff finds that no substantive change to the findings in the Record of Decision would occur as a result of the attached reevaluation (Exhibit 2). The Sunset Area Community Planned Action NEPA/SEPA FEIS adequately examines the impacts of the overall project, and the proposed



changes in the Master Site Plan would not result in modification to those conclusions. No new or significantly different impacts to the environment would occur.

Mitigation measures incorporated in the proposal and identified in the FEIS, combined with additional consultation and mitigation documented in the Record of Decision, represent reasonable steps to reduce adverse environmental effects of the proposed project. Together, these measures would reduce effects to acceptable levels.

Based on an analysis of the project's impacts and proposed mitigation, no additional mitigation is warranted as a result of changes proposed in the Master Site Plan. Staff recommends that the Responsible Officials:

**Issue the ROD Reevaluation and Addendum and Adopt Existing Environmental Document.**

## **B. Exhibits**

Exhibit 1	ERC Report, dated December 8, 2014
Exhibit 2	Renton Sunset Area Reevaluation and Addendum, dated December 2014 Including: Attachments 1-21
Exhibit 3	Draft NEPA/SEPA EIS
Exhibit 4	Final EIS
Exhibit 5	Record of Decision
Exhibit 6	Planned Action EIS
Exhibit 7	Mitigation Measures
Exhibit 8	Traffic Analysis

## **C. Environmental Impacts Analysis**

*The Proposal was circulated and reviewed by various City Departments and Divisions to determine whether the applicant has adequately identified and addressed environmental impacts anticipated to occur as a result of the proposed development. The following environmental analyses compare the conclusions of the FEIS selected alternatives (Alternative 3 / Preferred Alternative) to the Reevaluation Alternative. They conclude that the revised Master Site Plan would not significantly change those impacts significantly from those identified in the FEIS:*

### **1. Land Use**

The Land Use analysis in the FEIS concluded that the Sunset Area subarea would advance goals and objectives of the Comprehensive Plan and Center Village (CV) zoning classification. It would serve as an incentive for other redevelopment opportunities near the study area. Anticipated growth would also help the City meet its 2031 housing and employment targets. These conclusions are still valid for the Reevaluation Alternative which promotes a mixed use redevelopment with open space and civic amenities.

Selected Sunset Area Alternatives anticipated a range of 266-479 more dwelling units than existing conditions in a mixed-use development that integrates commercial and civic spaces. The Reevaluation Alternative would provide a maximum of 675 net units in the Potential Sunset Terrace Redevelopment subarea. A greater number of units would be located in the immediate study area, but net growth in the overall Sunset Area neighborhood would equate to the number of residential units evaluated in the FEIS. The Reevaluation Alternative would continue to implement the overall vision for the Sunset Area neighborhood identified in City plans and codes. Where there are differences between the Revaluation Alternative and specifics of the Renton Municipal Code (RMC), application for modifications or conditional uses would be made; the City will evaluate such proposals based on the City's adopted criteria, which promote compliance with the intent of standards. Therefore, no changes in overall FEIS conclusions are anticipated.



FEIS mitigation measures would still be applicable and appear to be well implemented by the Reevaluation alternative since it provides a “protected” large open space, the most intensive development along SR 900, and less intense development on the north side of the loop road.

**Mitigation Measures:** No further mitigation recommended.

**Nexus:** Not applicable.

## **2. Aesthetics**

Existing aesthetic conditions are documented in detail in Chapter 3.12.1 of the Draft NEPA/SEPA EIS (Exhibit 3). As described in that document, the built environment in the study area generally consists of one- and two-story single-family, multifamily, and commercial buildings at relatively low development intensity, with some three-story apartment buildings present as well. Much of the housing stock in the area is older, and many of the structures, both residential and commercial, are in need of repair.

Overall, visual bulk, as well as light and glare, are quite low. Most of the light and glare present in the study area is generated by vehicular traffic on NE Sunset Boulevard. Sidewalks in the area are generally narrow or not present, and the streetscape is generally lacking in pedestrian amenities, though mature street trees are present in many areas.

The construction of additional housing units in the Sunset Terrace Redevelopment Area, combined with the reconfiguration of the park, would result in additional building height beyond the level studied under Alternative 3 or the Preferred Alternative studied in the NEPA/SEPA EIS, specifically at Sites H, I, and J proposed for development along NE Sunset Boulevard.

The proposed maximum building heights under consideration, depending on location, are 52-68 feet above grade (Exhibit 2, diagrams show elevations at 50, 60, and 70 feet). Although existing buildings adjacent to the subject site were constructed at a lower scale, those sites are zoned Center Village and therefore the buildings have the potential to achieve 50-60 feet in height under future development scenarios.

### Visual Character

Relative to Alternative 3 and the Preferred Alternative, the Reevaluation Alternative would represent very minor additional changes to the visual character of the Sunset Terrace Redevelopment Area. The overall character of the neighborhood would continue its transition from a low-rise, low-intensity land use pattern to a higher-density, mixed-use, pedestrian-oriented village. Though the Reevaluation Alternative would further intensify this pattern, improvements to the streetscape and pedestrian environment that will accompany future development, such as bicycle lanes, planted medians, and enlarged sidewalks, will provide aesthetic improvements over the current visual character of the area. With application of required design standards and implementation of the mitigation measures established in the NEPA/SEPA EIS (Exhibit 4), no additional significant adverse impacts to visual character are anticipated.

### Height and Bulk

Alternative 3 evaluated building heights of 2-4 stories, which was within the range of current zoning regulations. The Reevaluation Alternative would introduce building heights of 5-6 stories along NE Sunset Boulevard, which would exceed the current maximum height allowed by zoning. This would increase the visual prominence of development in the Sunset Terrace Redevelopment Area, particularly given the location of future buildings on Sites H, I, and J along NE Sunset Boulevard, which is a high-traffic street. Site D with an additional story would be greater in height than development to the west. Exceeding the maximum allowed building height would require a conditional use permit from the City, to which conditions may be applied to mitigate potential impacts of views from public spaces such as SR 900 and the future Sunset Park.

To offset the impact of proposed building heights and bulk, the Reevaluation Alternative includes a larger amount of park space in the Redevelopment Area, which would provide a substantial amenity to area



residents and reduce the overall visual impression of height and bulk from viewers located further northward of the loop road or in development west of the site. For park users, who would be closer to the proposed buildings, increased height could create a perception for park uses of being surrounded by buildings looming over them, depending on design treatments. There would be increased height and bulk from the perspective of pedestrians on NE Sunset Boulevard; thus, small adjustments to reduce height and bulk related to the increased height and intensity of the structures would reduce impacts. City design standards will require some building modulation and roofline variation. RMC 4-3-100E.1, Transition to Surrounding Development, requires:

*At least one of the following design elements shall be used to promote a transition to surrounding uses:*

- 1. Building proportions, including step-backs on upper levels in accordance with the surrounding planned and existing land use forms; or*
- 2. Building articulation to divide a larger architectural element into smaller increments; or*
- 3. Roof lines, roof pitches, and roof shapes designed to reduce apparent bulk and transition with existing development.*

*Additionally, the Administrator may require increased setbacks at the side or rear of a building in order to reduce the bulk and scale of larger buildings and/or so that sunlight reaches adjacent and/or abutting yards."*

However, additional consideration of City design standards regarding upper story setbacks is recommended. In order to mitigate identified impacts to surrounding development, the future buildings located on Sites H, I, and J are recommended to incorporate specific design elements. Based on the Renton Sunset Area Reevaluation and Addendum (Exhibit 2), staff recommends a mitigation measure requiring the application of criterion 1 and 3 to future buildings on Sites H, I, and J along NE Sunset Boulevard. Application of these recommendations would be considered during the height-based conditional use permit review and during future detailed Site Plan Review and would serve to mitigate impacts to surrounding development.

#### Shade and Shadow

While the Reevaluation Alternative would introduce greater building heights in the Sunset Terrace Redevelopment Area, the incremental effect on shading conditions would be minor. The nearby pedestrian areas are already likely to experience some moderate shading from buildings and street trees under Alternative 3 and the Preferred Alternative, as described in the NEPA/SEPA EIS.

Increased height on Sites D, H, I, and J at the southern and western end of the Redevelopment Area would have the potential to slightly increase the length of shadows cast on the interior park to the north. However, reconfiguration of the park to increase its size as part of the updated Master Site Plan process would ameliorate this to some degree, and the application of design standards would further reduce shading impact from increased building height.

**Mitigation Measures:** Future buildings on Sites H, I, and J along NE Sunset Boulevard, shall be required to comply with RMC 4-3-100.E.1, Transition to Surrounding Development. Specifically:

1. Building proportions, including step-backs on upper levels in accordance with the surrounding planned and existing land use forms; and
3. Roof lines, roof pitches, and roof shapes designed to reduce apparent bulk and transition with existing development.

**Nexus:** RMC 4-3-100.E.1, Transition to Surrounding Development, Environmental (SEPA) Regulations

### **3. Transportation**



The Master Plan assumes future NE Sunset Boulevard (SR 900) improvements to a “complete streets” standard where feasible (RMC 4-6-060.G). Master Plan lots fronting SR 900 have a frontage line consistent with future improvements.

A loop road would occur along Sunset Lane NE and would encircle the Park. Along the library and mixed-use building space, the lane could be specially paved and serve as a plaza for special events. The width of this roadway is 49 feet (Exhibit 2, Figure 6).

The Sunset Area “green connections” would be implemented per the Sunset Area Surface Water Master Plan such as on Harrington Avenue NE that traverses the Master Plan site. The City is considering street reclassifications and two new street sections for roads that have 60-foot rights-of-way presently: Green Collector and Neighborhood Collector (Exhibit 2, Figure 7). Based on a review by CH2MHill, the 60-foot right-of-way is consistent with the “Green Connections” cross section in the Sunset Area Surface Water Master Plan. However, the Green Connections can only be implemented in some locations and therefore a 60-foot cross-section for a Neighborhood Collector is also proposed (Exhibit 2, Figure 7).

Based on the results of the traffic analysis (Exhibit 8), the Reevaluation Alternative is expected to operate similarly to the FEIS Preferred Alternative and Alternative 3. The intersection LOS at each study location is expected to be the same between each of the alternatives, in both 2015 and 2030. The average vehicle delay difference at most of the study intersections in the Reevaluation Alternative is expected to be negligible compared to the delay with Alternative 3 or the Preferred Alternative. Similar mitigation measures as identified in the FEIS would still be required.

**Mitigation Measures:** No further mitigation recommended.

**Nexus:** Not applicable.

#### **4. Noise**

Development would result in a noise increase from vehicles traveling on NE Sunset Boulevard and local streets. As disclosed in the FEIS, the estimated day-night noise levels from NE Sunset Boulevard at the adjacent buildings indicates they would be exposed to “normally unacceptable” noise levels exceeding U.S. Department of Housing and Urban Development’s (HUD’s) outdoor day-night noise criterion of 65 dBA. There is no change in the overall neighborhood growth and therefore no change in projected traffic volumes and associated noise from the prior 2011 FEIS.

As the Reevaluation Alternative makes some site plan changes (e.g., different arrangement of market rate and affordable units), setbacks of buildings from the future SR 900 improvement boundaries are less than for the FEIS Preferred Alternative; the Master Plan continues to encircle the park with buildings. Due to traffic noise from the adjacent street (NE Sunset Boulevard), portions of the Potential Sunset Terrace Redevelopment Subarea would be deemed “normally unacceptable” under the HUD noise criteria. The noise levels would be considered unacceptable under existing conditions as well as the No Action Alternative, without implementation of noise attenuation mitigation.

Based on a review of the Reevaluation Alternative, the arrangement of buildings and likely distances of buildings to the future SR 900 centerline appear to be in the range of FEIS assumptions studied for Alternatives 1, 2 and 3 and the Preferred Alternative. Therefore, EIS results would not appreciably change; as described in the chart, the Master Site Plan approach appears to address FEIS mitigation measures.

The buildings containing market rate units are proposed to be located along SR 900 would be modulated pursuant to the City’s design standards; additionally, the existing topographic relief, especially west of Harrington Avenue NE would reduce the number of units which abut SR 900. While some private open space provided to the market rate residential units may be located near SR 900, the primary open space would be the public park, which would be located well away from SR 900. Units that are to be supported with public funding are placed north of the proposed park, the furthest distance from SR 900.



Finally, the International Building Code and the State Energy Code standards would likely require building materials and practices that could meet, or even surpass, the standard STC rating.

**Mitigation Measures:** No further mitigation recommended.

**Nexus:** Not applicable.

## **5. Parks and Recreation**

Since the time of the FEIS, the City has adopted a Parks, Recreation and Natural Areas Plan, which includes a *recommended* level of service (LOS) standard for developed parks of 5.07 acres per 1,000 people. Based on an ESRI demographic summary of the Renton Sunset area of nearly 0.44 square miles, the average household size in 2010 was shown at 2.40. Applying this to the proposed net increase of 675 dwellings in the Sunset Terrace subarea the population would equal nearly 1,620 persons. The *recommended* developed parkland LOS is for system-wide parks and not based on a metric related to the proximity of parkland acres to a population segment; however, the future residents of the Sunset Terrace Redevelopment subarea will benefit from 3.2 acres of developed parkland within walking distance. Furthermore, the addition of 3.2 acres of developed parkland will add to the City's total park acreage and raise the actual LOS above the recommended minimum standard.

In summation, the conclusions of the FEIS Selected Alternatives apply to the Reevaluation Alternative, except that the Reevaluation Alternative provides more developed park acreage than the FEIS Selected Alternatives.

**Mitigation Measures:** No further mitigation recommended.

**Nexus:** Not applicable.

## **6. Public Services**

The FEIS identified specific demand ratios for all of the services and calculated the number of personnel, space, etc. that would result from the growth in the neighborhood as a whole and in the Potential Sunset Terrace Redevelopment Subarea. There would be an increase in dwellings and population in the Potential Sunset Terrace Redevelopment Subarea, but no change to the growth in overall neighborhood dwellings and population, under the Reevaluation Alternative. Therefore, it is anticipated that the share of demand for services and space would slightly increase in the Potential Sunset Terrace Redevelopment Subarea, but not in the neighborhood as a whole. No significantly different impacts would occur and FEIS mitigation measures are still applicable.

## **7. Utilities**

### Water

A conceptual water main improvements layout for the proposed developments identified in the conceptual master plan is presented in Exhibit 19. For this portion of the Sunset Terrace Redevelopment area, the diagram updates the information contained in the Final EIS but is intended to meet City standards as described in the Final EIS.

### Sewer

Sites plans will be required to show the location of the existing sewer system in order to determine the potential re-use of existing sewer (conditioned on lining the existing sewer mains and manholes) provided the location does not interfere with the ultimate roadway/building alignments.

**Mitigation Measures:** No further mitigation recommended.

**Nexus:** Not applicable.



#### **D. Comments of Reviewing Departments**

The proposal has been circulated to City Department and Division Reviewers. Where applicable, their comments have been incorporated into the text of this report. Copies of all Review Comments are contained in the Official File and may be attached to this report.



## REEVALUATION / ADDENDU

### Renton Sunset Terrace Redevelopment | December 2014

*Prepared By: BERK Consulting in association with CH2MHill, Mithun, and Weinman Consulting LLC*

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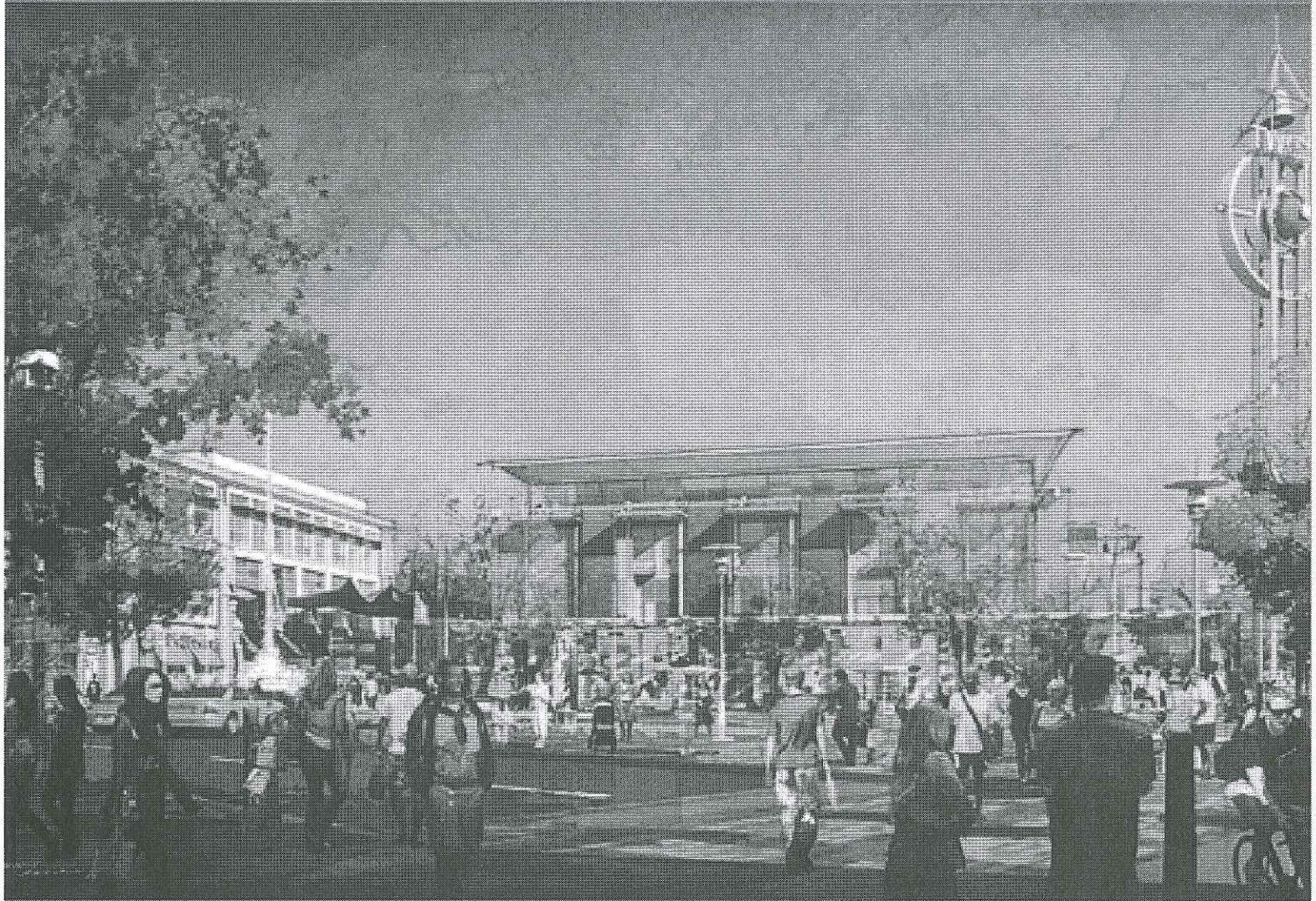
## EXHIBIT 2



Entire Document  
Available Upon Request

# SUNSET AREA COMMUNITY PLANNED ACTION

DRAFT NEPA/SEPA ENVIRONMENTAL IMPACT STATEMENT • VOLUME 1 • DECEMBER 2010



Issued by:

**City of Renton**

NEPA Responsible Entity and  
SEPA Lead Agency

Prepared in partnership with:

**EXHIBIT 3**

RENTON. AHEAD OF THE CURVE

City of  
**Renton**  
Community & Economic Development

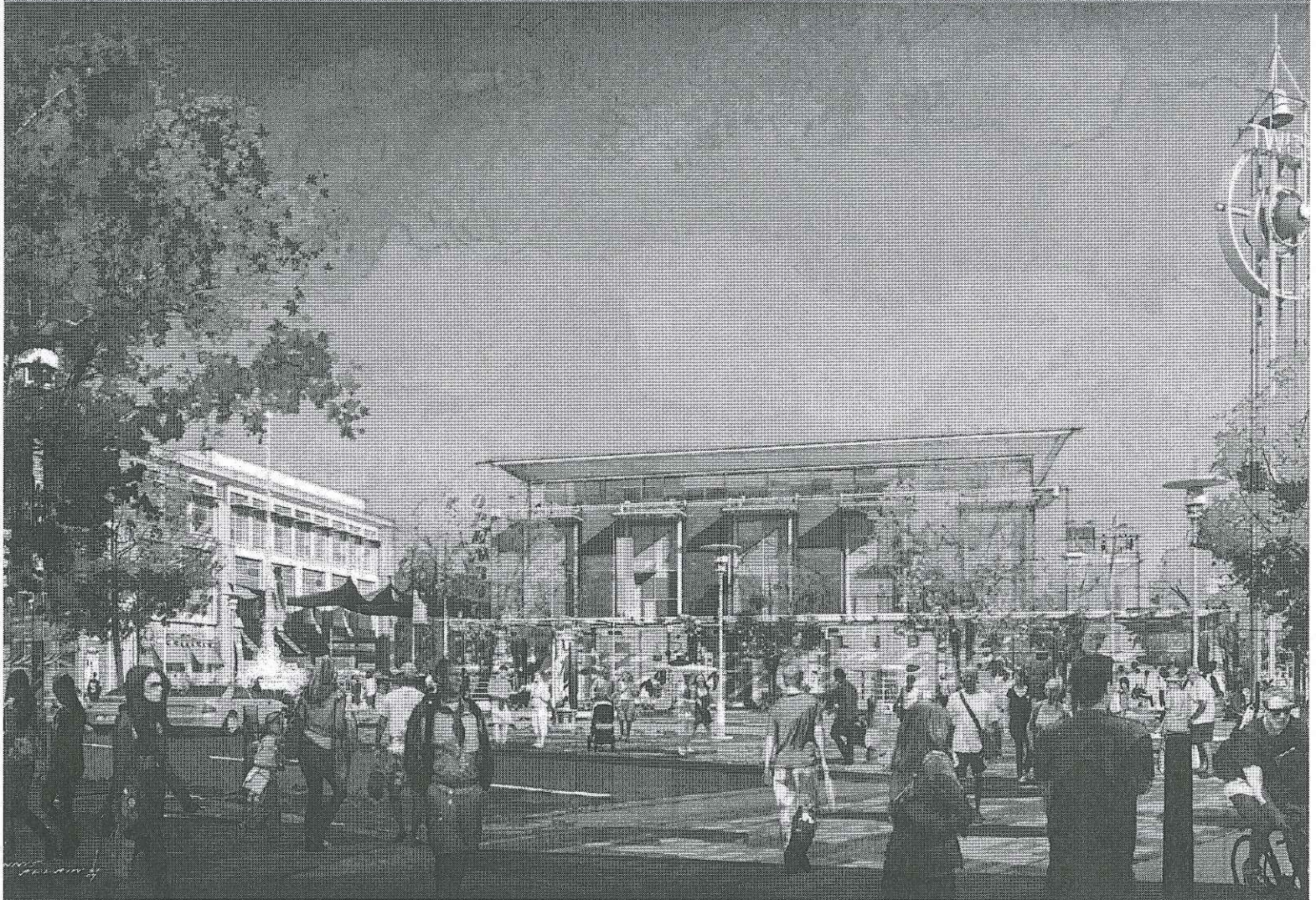




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# SUNSET AREA COMMUNITY PLANNED ACTION

FINAL NEPA/SEPA ENVIRONMENTAL IMPACT STATEMENT • VOLUME 1 • APRIL 2011



Issued by:

**City of Renton**

NEPA Responsible Entity and  
SEPA Lead Agency

Prepared in partnership with

## EXHIBIT 4

RENTON. AHEAD OF THE CURVE.

City of  
**Renton**  
Community & Economic Development





## Record of Decision Sunset Area Community Planned Action EIS

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### Introduction

The Council on Environmental Quality (CEQ) directs the implementation of the National Environmental Policy Act (NEPA). CEQ rules require agencies to prepare a Record of Decision (ROD) after preparing an environmental impact statement (EIS) (Title 40 of the Code of the Federal Register part 1505.2). The purpose of a ROD is to explain why the agency has taken a particular course of action. A ROD must include the following elements:

- An explanation of decision on a proposed action;
- Factors considered in making a decision;
- Alternatives considered and the environmentally preferred alternative;
- Adopted mitigation measures or reasons why mitigation measures were not adopted; and
- A monitoring and enforcement program for adopted mitigation measures.

This ROD addresses the redevelopment of the Sunset Terrace public housing community and its relationship to neighborhood growth and revitalization. Growth in the broader planning study area is not part of the proposal addressed in the ROD, and could occur independent of the Sunset Terrace proposal.

### Background

The City of Renton (City) is the Responsible Entity and lead agency for NEPA purposes. In accordance with specific statutory authority and the U.S. Department of Housing and Urban Development's (HUD's) regulations at 24 Code of Federal Regulations (CFR) part 58, the City is authorized to assume responsibility for environmental review, decision-making, and action that would otherwise apply to HUD under NEPA. Additionally, the City is the proponent of the broader Planned Action for the Sunset area which has had environmental review under Washington State Environmental Policy Act (SEPA) (Revised Code of Washington [RCW] 43.21C).



**AN ORDINANCE OF THE CITY OF RENTON, WASHINGTON, ESTABLISHING A  
PLANNED ACTION FOR THE SUNSET AREA PURSUANT TO THE STATE  
ENVIRONMENTAL POLICY ACT.**

THE CITY COUNCIL OF THE CITY OF RENTON, WASHINGTON, DOES ORDAIN AS  
FOLLOWS:

**SECTION I. Findings.** The Council finds as follows:

- A. The City is subject to the requirements of the Growth Management Act, RCW 36.70A ("GMA") and is located within an Urban Growth Area;
- B. The City has adopted a Comprehensive Plan complying with the GMA, and is amending the Comprehensive Plan to address transportation improvements and capital facilities specific to the Sunset Area;
- C. The City has adopted a Community Investment Strategy, development regulations and design guidelines specific to the Sunset Area which will guide growth and revitalization of the area, including the Sunset Terrace public housing project;
- D. The City has prepared an EIS for the Sunset Area, and the EIS adequately addresses the probable significant environmental impacts associated with the type and amount of development planned to occur in the designated Planned Action area;
- E. The mitigation measures identified in the Planned Action EIS and attached to this ordinance as Attachment B, together with adopted City development regulations, will adequately mitigate significant impacts from development within the Planned Action area;

## Attachment C. Sunset Area Selected Alternatives EIS Mitigation Measures

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## Sunset Area Community Planned Action

# Traffic Analysis Results – May 2014 Redevelopment Master Site Plan Alternative

### INTRODUCTION

This memorandum provides traffic analysis results for the May 2014 Redevelopment Master Site Plan Alternative, or Reevaluation Alternative, of the Sunset Area Community Planned Action, and compares these results with operations for Alternative 3 and the Preferred Alternative as documented in the Final NEPA/SEPA EIS.

Compared to Alternative 3, the Reevaluation Alternative includes a maximum of 90 additional units in the Potential Sunset Terrace Redevelopment Subarea. These 90 additional units are shifted out of the North, South, and Sunset Mixed Use areas of the Planned Action study area. This analysis focuses on the intersection operations expected as a result of this shift.

### TRIP GENERATION AND DISTRIBUTION

Trips generated by Alternative 3 and the Preferred Alternative in the Planned Action study area were estimated using the City's version of the PSRC regional travel forecasting model with applied future-year proposed land uses. The Alternative 3 traffic volumes, as analyzed in the Final NEPA/SEPA EIS, were used as a base to develop the Reevaluation Alternative volumes.

Trips generated by the 90 additional units were removed from the North, South, and Sunset Mixed Use areas, and re-routed to the Potential Sunset Terrace Redevelopment. Assuming the 90 shifted housing units consist of medium to high density low-rise apartment dwellings, approximately 61 trips<sup>1</sup> would be generated during the weekday PM peak hour. (Source: Institute of Transportation Engineers, Trip Generation Manual, 9th Edition, Institute of Transportation Engineers.)

Approximately half of the units (47 units) would be shifted from the North subarea, 37 percent (33 units) would be shifted from the South subarea, and the remaining 11 percent (10 units) would come from the northeast end of the Sunset Mixed Use subarea.

### TRAFFIC ANALYSIS RESULTS

Traffic analysis results were calculated for the PM peak hour for the years 2015 and 2030. In general, future traffic patterns in the Reevaluation Alternative would differ slightly from both the Preferred Alternative and Alternative 3.

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<sup>1</sup> These would be new trips to the Potential Sunset Terrace Redevelopment area, but shifted from other areas of the Planned Action neighborhood.